REMARKS

This amendment is submitted in response to the final Office Action dated June 14, 2005 and a telephone interview between Examiner Nguyen and Mr. Thompson August 17, 2005. The Examiner is thanked again for his time and consideration of this matter. The amendments and remarks herein reflect what was discussed in the interview as described below.

Claims 1, 20, 40-41 and 43-46 have been cancelled; claims 2-3, 12, 21-22 and 47 have been amended; and claims 49-50 have been added. The amendments to claims 12 and 47 were made in response to the Examiner's request in the interview. As a result of these amendments, independent claims 12, 31, 39, 42, and 47-50 are pending, and the remaining claims depend from one of claims 12, 31, 47 or 48 as appropriate. Independent claims 47-50 are directed to methods and apparatus for accessing a second application programming interface (API) in a second computing environment from a first process in a first computing environment, and independent claims 12, 31, 39 and 42 are directed to methods and apparatus for automatically generating applications that allow operation of an API in a second computing environment from a first process in a first computing environment.

In the Office Action, the previous rejections of claims 1-3, 5-10, 20-22, 24-29, 40, 41, 43 and 45-46 under 35 U.S.C. § 103 in view of Combs was maintained, and this rejection was also extended to claims 47-48 which were newly added in the last response. During the above-referenced telephone interview, the distinctions between claim 47 and Combs were discussed. The Examiner indicated that claim 47 appears to recite subject matter that is not shown in Combs, and further indicated that he would give full consideration to the patentability of claim 47 upon receiving this after-final response. It is noted that original claims 1, 20, 40 and 41 have been cancelled in favor of claims 47-50. For the Examiner's convenience, a summary of the key distinctions between these claims and Combs is provided below. The Examiner is also referred to pages 28-29 of the previous response dated November 30, 2004.

Claim 47 recites that the first function call includes a first function call parameter, and that neither the first function call nor the first function call parameter are usable as generated by the first process to access the second application programming interface. Claim 47 further recites the accessing of an application programming interface definition defining (i) a mapping of the first function call and the first function call parameter to corresponding meta parameters, wherein a first meta parameter is an intermediate representation of the first function call and is mapped to a second function call defined in the second application programming interface, and a second meta parameter is an intermediate representation of the first function call parameter and is mapped to a second function call parameter usable with the second function call to access the second application programming interface. These meta parameters are included in an encapsulated function call that is sent from the first computing environment destined for the second computing environment, in which the meta parameters can be used to generate a corresponding function call and function call parameter of the second API.

As described in the previous response and the interview, Combs shows a method and system for allocating distributed resources of a computer network to application programs running on computers also attached to the network. A distributed resource allocator system comprises a number of identical processes running on the computers of the network. Application programs request allocation of resources from a local distributed resource allocator system process using a resource allocator applications programming interface ("RA-API"). Application programs request allocation of resources from a remote distributed resource allocator system process via the RA-API and a resource allocator access protocol ("RAAP").

Referring to Figure 5 of Combs, in the case of a remote resource allocation request, an RA user communicates with a Remote Access Agent User via the RA-API. The Remote Access Agent User in turn communicates with a Remote Access Agent System via the RAAP, and the Remote Access Agent

System communicates with the resource allocator system using the same RA-API used between the RA user and the Remote Access Agent User. This functionality is described beginning at column 5, line 36 of Combs. It is emphasized that "when a user requests services from a RASA running on a remote computer, it makes those requests using the very same RA-API as it would use to make requests of a RASA running on the local computer system..." Moreover, it is apparent from Figure 5 and elsewhere in Combs that the resource allocator system employs the <u>very same </u>RA-API to communicate with the Remote Access Agent System as it uses to communicate with a local RA user.

Combs is not seen to teach or suggest the features of claim 47. In particular, Combs is not seen to show a first function call parameter that is not usable to access a second API, and is represented by a meta parameter mapped to a second function call parameter that is usable to access the second API. In Combs, the RA user and RA system both employ the same RA-API, and therefore any function call parameters generated by the RA user <u>can </u>be used to access the API of the RA system. Further, the system of Combs does not access an API definition in order to obtain meta parameters that are intermediate representations of first function call parameters and that are mapped to second function call parameters. There are no such meta parameters in Combs. Any parameters in a particular RA-API request are sent <u>as is</u> to the RA system after an encapsulation of the request for transport purposes only.

Because Combs lacks the functionality recited in claim 47 as described above, claim 47 is believed to be allowable in view of Combs. Furthermore, as claims 48-50, 2-11, and 21-30 also recite (either directly or indirectly) the same or similar features to those recited in claim 47, these claims are likewise seen to be allowable in view of Combs. Favorable action is respectfully requested.

In the Office Action, the previous rejections of claims 4, 11-19, 23, 30-39, 42 and 44 under 35 U.S.C. § 103 in view of Combs and Saulpaugh was maintained. During the above-referenced interview, it was pointed out that the

final Office Action does not specifically address the remarks that were made in the previous response regarding the distinctions between claim 12, for example, and the Combs/Saulpaugh combination. The Examiner is urged to reconsider this rejection in light of the remarks that appear on pages 28-32 of the previous response dated November 30, 2004. It is of course hoped that those remarks convince the Examiner to allow claim 12 as well as the other claims of this group. If that should not be the case, however, it is respectfully requested that any subsequent Office Action set forth a specific response to those remarks to enable Applicant to better understand the basis for this rejection.
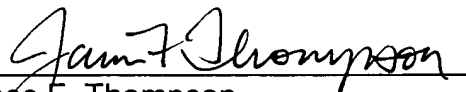
Based on the foregoing, it is believed that this application is in condition for allowance, and such action is respectfully requested. If there should be any issues remaining after this amendment, the Examiner is urged to telephone the undersigned attorney to resolve such issues expeditiously if possible, especially in view of the after-final stage of the proceedings.

No fee is believed to be required. If the U.S. Patent and Trademark Office deems a fee necessary, this fee may be charged to the account of the undersigned, Deposit Account No. 50-0901.

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 366-9600, in Westborough, Massachusetts.

Respectfully submitted,

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